UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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Reply To
Attn Of: ECL-116

Date: January 21, 2000

From: Mike Sibley, OSC Dept.: USEPA-10 (ECL-116)

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To: See distribution on last page

SUBJECT: POLREP 4 for TAYLOR LUMBER AND TREATING, INC.
Removal Action, Sheridan, Oregon

II BACKGROUND

Site No.: 10F1
Action Memo Status: September 28, 1999
Delivery Order: PRP Lead
NPL Status: Not listed
Response Authority: CERCLA
State Notification: Oregon Department of Environmental Quality notified
Response Start Date: November 29, 1999
Completion Date: Unknown
Incident Category: Removal Action
Website Address:
http://epainotes1.rtpnc.epa.gov:7777/R10/CLEANUP.NSF/sites/TLT

The Taylor Lumber and Treating, Inc. (TLT) site, located in Sheridan, Oregon, is a wood- treating facility that manufactures lumber, wooden telephone and electrical power poles, pilings, and railroad ties. The preserved products (poles, pilings, and railroad ties) are coated with either creosote or pentachlorophenol (PCP) solutions. P-9 oil (petroleum products) is also used in conjunction with PCP. In previous years, the facility used a chrome, copper, and arsenic (CCA) solution for preservation. Operating practices and spills have resulted in contamination of surface soil, subsurface soil, and groundwater. Contamination has migrated off site via ditches on the perimeter of the

property and via air releases.

Several investigations have revealed widespread surface soil contamination (especially arsenic), contamination of sediment in ditches and groundwater contamination. An EPA Listing Site Inspection was conducted in 1990, RCRA Facility Inspections were conducted in 1991 and 1996, and an EPA Integrated Assessment is in progress. Several residences are located within 3 mile of the facility and ditches lead to the South Yamhill River several hundred feet south of the facility.

The South Yamhill River is habitat to for anadromous fish, including Coho Salmon and Steelhead Trout. Other recreational species include Largemouth Bass, Bluegill, Crappie, and Channel Fish. Groundwater contamination, roughly 20 feet below ground surface, consists of a product layer one to several feet thick resting on siltstone. The product layer is migrating toward the Highway to the south of the facility and the South Yamhill River.

IIISITE INFORMATION

A.Incident Category: The CERCLIS ID number for this site is ORD009042532.

B.Site Description

(See POLREP 1).

C.Situations

January 14, 2000 - January 21, 2000

January 14, 2000 (Friday)

Personnel on site: 1 OSC, 1 USCG, 4 START, 3 ERRS
Weather: Partly cloudy, rain showers, temperature in the 40-s to (Mid 40s).

START continued conducting soil sampling on a 40-foot grid in the northwest treated pole storage area. Samples at 6-inch and 12-inch depths were collected at 13 locations in the 40-foot grid area. Six of the 13 samples were found to have arsenic concentrations above the 300 ppm action level established for arsenic. Arsenic concentrations ranged from 301 to 8,140 ppm. Soil locations having arsenic concentrations above the Action Level at 6- inches deep were resampled at 12-inch depths. Samples were analyzed on site using XRF (X-ray fluorescence) to determine excavation locations.

ERRS personnel continued soil staging and continued oversight of drilling subcontractor (GEO TECH EXPLORATION), which installed monitoring well MW12 on the southern end of TLT. The subcontractor finished developing monitoring wells MW 12, 13, 14, 15

and 16, completed monument construction and demobilized from the site.

Slug tests were initiated in the wells in the siltstone (MW-2D, MW-3D, MW-4D, MW-5D, MW-6D, MW-7D, and MW-8D). Two tests will actually be performed, i.e., a falling head and a rising head test. Each of these tests is expected to 10 to 90 minutes. In the worst case, three hours would be needed for each well, plus 15-20 minutes transition time between the wells. Testing is to be completed by Friday, January 21st.
Geo tech samples were sent to laboratory in Portland.

START provided technical oversight, and completed Geo logs during monitor well installation. START provided technical oversight and water analysis during well development and conducted slug testing of the monitoring wells. START continued investigation treatment technologies for groundwater remediation.

START continued oversight of TLT excavation work of the arsenic contaminated sediment from the ditch along the northern edge of the treating plant, and along the ditch east of the treating plant and adjacent to Rock Creek Road. Additionally, samples were collected from the ditch excavations to confirm that arsenic impacts were removed. The samples were analyzed using X-Ray Fluorescence equipment provided by USEPA. A portion of samples were submitted for analysis at a fixed laboratory.

The excavated material was placed on-site in containment cells prepared by USEPA=s contractor.

TLT also submitted the surface water inspection plan to USEPA for review.

<u>January 15, 2000 (Saturday)</u>

Personnel on site: 1 OSC, 1 USCG, 4 START, 3 ERRS
Weather: Partly cloudy, rain showers, ice, temperature in the 30=s to (Mid 30s).

START continues composite soil sampling on a 40-foot grid in the northwest treated pole storage area. Samples were analyzed on-site using XRF.

START continues slug testing the monitoring wells, collects aquifer water level measurements and begins 36-hour baseline aquifer water level measurements. START continues investigating groundwater remediation options.

<u>January 16, 2000 (Sunday)</u>

Personnel on site: 0 OSC, 0 USCG, 0 START, 0 ERRS
Weather: Partly cloudy, rain showers, high winds, temperature in the 40=s (to mid 40s)

No personnel on site due to high winds and rain.

<u>January 17, 2000 (Monday)</u>

Personnel on site: 1 OSC, 1 USCG, 4 START, 3 ERRS

Weather: Partly cloudy, rain showers, temperature in the 30 (to mid 30's)

START conducts step drawdown test and continues slug tests, sampling and XRF field screening of NW corner soils, and investigation of removal options. ERRS assists START in sampling and pump testing efforts. Step drawdown test observed by Taylor consultant (Maul Foster and Alongi).

Soil samples shipped to laboratory for confirmation of XRF data and for TCLP analysis of excavated soils.

TLT has completed the ditch excavation work of the arsenic hot spots, except for the southern most portion at the end of the ditch at Rock Creek road were there is to much water flowing through at this time. After CLP result come in will back fill excavated areas.

January 18, 2000 (Tuesday)

Personnel on site: 1 OSC, 1 USCG, 4 START, 3 ERRS
Weather: Partly cloudy, temperature in the 30 (to low 40s)

START conducts 12-hour drawdown test of aquifer and continues sampling and XRF analysis of NW Corner of the treated pole yard. MFA representative observes drawdown test. Sampling of the NW Corner is continuing in a grid pattern in an effort to find the boundary of contamination that exceeds 300 ppm. START continues investigating removal options and clarifies data required for steam treatment. START investigates Taylor boiler capacity. START begins scheduling post-field activities.

ERRS assists START with pump test and sampling efforts and ships samples of excavated soil to a laboratory for dioxin analysis. ERRS continues to evaluate treatment and disposal options for excavated soil and removal of DNAPL plume.

January 19, 2000 (Wednesday)

Personnel on site: 1 OSC, 1 USCG, 5 START, 3 ERRS
Weather: Partly cloudy, rain showers, temperature in the 35 (to low 40s)

START personnel sampled two monitoring wells. START conducts a second step drawdown test and takes water level measurements. MFA representative observes drawdown test and well purging. START completes sampling, XRF analysis and GPS survey of NW Corner of Treated Pole Storage.
START continues to investigate treatment options. START and OSC meet regarding post- field scheduling and strategy.

ERRS transferred approx. 400 gallons of pump test water from a poly storage tank (7000 gallon) to the water treatment system located at Taylor lumber.

ERRS updates project schedules, continues investigating soil disposal and DNAPL removal options, and assists START with pump test efforts.

January 20, 2000 (Thursday)

Personnel on site: 1 OSC, 1 USCG, 5 START, 3 ERRS
Weather: Partly cloudy, rain showers, temperature in the mid 30s to lower 40s

START personnel complete water level measurements and sampling of monitoring wells and continue to conduct slug tests. MFA representative observes well sampling and slug tests and conducts split sampling of well water. START continues to obtain information on cost estimates, treatment options and treatability studies. START prepares soil samples and well samples for laboratory analysis.

START completed soil sampling on a 40-foot grid in the northwest treated pole storage area which covered a 300X300 foot area. Preliminary results of the sampling include 125 samples taken with concentrations as high as 14,800 ppm in some areas via XRF. Currently waiting CLP confirmation results.

ERRS assists with well sampling, slug tests, handling of IDW, and contracting laboratory services. Drillers on site to complete the installation of traffic barriers around newly installed wells. Surveyors survey newly installed wells.

January 21, 2000 (Friday)

Personnel on site: 1 OSC, 3 START, 3 ERRS
Weather: Cloudy, rain showers, temperature in the mid 30s to lower 40s.

START completes slug tests and delivers samples to the laboratory. MFA on site to observe slug tests. ERRS arranges for the demobilization of on-site storage tank. Crews demobilize for this phase of the removal. Remobilization to site be determined at later date.

D.Next Steps

1. Analyze pump test data. Run groundwater model scenarios
2. Evaluate additional groundwater data needs. Conduct field work if required.
3. Evaluate groundwater remediation/containment options
4. Determine disposition of soils.
5. Determine scope of Removal Phase II
5. Subcontract asphalt services
6. Backfill excavated soil in ditch areas (Taylor)
7. Excavate submerged portions of ditches when weather dries (Taylor)

IVCOST INFORMATION

Estimated costs are summarized below:

	Established Ceiling	Estimated Costs (As of 12/09/99)
START	$170,000	$125,500.00
EPA	$10,000	$7,000.00
USCG	$50,000	$10,551.25
ERRS	$886,200	$196,002.85
TOTAL	$1,116,200	$339,054.10

VDISPOSITION OF WASTES

The following wastes are staged on site as of January 21, 2000. This is the existing waste which was staged from a spill cleanup which concluded in late November 1999.

Soil Staged in Treating Yard 1,700 cubic yards

As of this date, 65 cubic yards of rock has been washed & screened out of the 1,700 cubic yards which is staged in the treating yard.

VIDISTRIBUTION

TO:EPA Headquarters, Washington, D.C., Attention: Terry Eby
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EPA Region 10, Attention: OSCs
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